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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**EASTERN DIVISION – RIVERSIDE**

SAVE OUR FOREST ASSOCIATION,  
INC.

Case No.: 5:24-cv-01336

Plaintiff,

**STIPULATION FOR PROPOSED  
BRIEFING SCHEDULE**

vs.  
UNITED STATES FOREST SERVICE, *et  
al.*,

Action Filed: June 25, 2024  
Trial Date: March 31, 2026

Defendants.

YUHAAVIATAM OF SAN MANUEL  
NATION, a federally recognized Indian  
tribe,

Defendant-Intervenor.

1 Andrew A. Smith (NM Bar No. 8341)  
2 UNITED STATES DEPARTMENT OF JUSTICE  
3 Environment & Natural Resources Division  
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20 *Attorneys for Defendant-Intervenor*

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1        WHEREAS, on August 27, 2024, Plaintiff Save Our Forest Association, Inc.  
2 (“SOFA”) filed its First Amended Complaint for Injunctive and Declaratory Relief”  
3 [ECF No. 24];

4        WHEREAS, Defendants (“USFS”) filed their Answer on November 8, 2024  
5 [ECF No. 29];

6        WHEREAS, on September 11, 2025, the Yuhaaviatam of San Manuel Nation’s  
7 (“Nation”) Motion to Intervene was granted [ECF No. 75];

8        WHEREAS, on August 18, 2025, and September 12, 2025, this Court entered  
9 orders [ECF Nos. 72, 76] establishing a briefing and hearing schedule for preparation  
10 of the administrative record (“AR”) and briefing of SOFA and USFS’s motions for  
11 summary judgment];

12        WHEREAS, on September 29, 2025, the AR was lodged [ECF No. 77] by  
13 USFS, and on October 20, 2025, SOFA filed a motion to complete the AR [ECF No.  
14 81], which was opposed by USFS on November 3, 2025 [DKT No. 84], and SOFA is  
15 presently drafting its reply;

16        WHEREAS, on October 9, 2025, Nation filed its Motion to Dismiss [ECF No.  
17 79], and USFS filed their opposition to the same on November 3, 2025 [ECF No. 83],  
18 and SOFA is presently drafting its opposition;

19        WHEREAS, on November 3, 2025, the Court [ECF No. 85] vacated the  
20 hearings and associated briefing schedules noticed for November 24, 2025, on the  
21 Nation’s Motion to Dismiss [ECF No. 79] and on SOFA’s Motion to Complete the  
22 Administrative Record [ECF No. 81];

23        WHEREAS, the mediation was set for October 21, 2025, [ECF No. 71], which  
24 date was vacated as a result of the shutdown, and the Parties have reached out to the  
25 mediator and expect mediation to be conducted in January 2026;

26        WHEREAS, the Parties wish to minimize their procedural disputes and  
27 proceed to resolution of this case in an expedited, yet orderly, manner by having the

1 Court set a schedule for briefing dispositive motions and cross-motions for summary  
2 judgment;

3 NOW THEREFORE, the Parties hereby stipulate and agree, and request that  
4 the Court enter an order setting the following schedule:

5 **Mediation**

6 1. Mediation shall be scheduled for January 6, 2026;

7 **Motion to Complete the Administrative Record**

8 2. SOFA's reply in support of its Motion to Complete the AR shall be filed no  
9 later than December 7, 2025;

10 3. The Hearing, if any, on the Motion to Complete the AR shall be held on  
11 January 5, 2026;

12 **Motion to Dismiss**

13 4. The hearing on the Nation's Motion to Dismiss shall be calendared no earlier  
14 than March 2, 2026. SOFA shall file its opposition to the Nation's Motion to Dismiss  
15 on or before Monday, February 2, 2026, and the Nation shall file its reply briefs to  
16 both the USFS and SOFA's opposition briefs on or before Monday, February 16,  
17 2026;

18 **Motions for Summary Judgment**

19 5. On or before the 30th day after the resolution of mediation, final resolution of  
20 the Motion to Complete the Administrative Record, whichever is later, SOFA shall  
21 file its summary judgment papers, including a statement of undisputed facts ("SUF"),  
22 with SOFA's facts and disputes numbered,<sup>1</sup> and with the memorandum of points and  
23 authorities not to exceed 25 pages;

24 6. On or before 60 days after the filing of SOFA's Summary Judgment Papers,  
25 USFS shall file their cross motions for summary judgment and oppositions to

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27 \_\_\_\_\_  
28 <sup>1</sup> The Parties shall follow the direction in this Court's standing order of March 24, 2016.

1 SOFA's motion for summary judgment and accompanying SUF/Statement of  
2 Genuine Disputes of Material Fact, and with the memorandum in support thereof not  
3 to exceed 30 pages;

4 7. On or before 45 days after the filing of USFS's cross motion/opposition, SOFA  
5 shall file its opposition/reply thereto, of no more than 20 pages along with an  
6 accompanying Statement of Genuine Disputes of Material Fact;

7 8. On or before 30 days after the filing of SOFA's opposition/reply, USFS shall  
8 file their reply, of no more than 15 pages;

9 9. Any claims or defenses available at the time but not raised during summary  
10 judgment briefing will be deemed to have been waived;

11 10. All briefing by Federal Defendants shall be joint;

12 11. Because the schedule presented above for production and judicial review of the  
13 merits of Plaintiff's claims based on the Administrative Record in accordance with  
14 the Administrative Procedure Act ("APA"), 5 U.S.C. § 706, is intended to be the full  
15 procedure for resolving this case on the merits, the Parties respectfully request that  
16 the Court vacate its March 6, 2025 "Civil Trial Scheduling Order," ECF No. 40.

17 12. Notwithstanding the immediately preceding paragraph, SOFA reserves the  
18 right to petition this Court for admission of extra-record evidence.

19  
20 Dated: December 2, 2025

Respectfully Submitted,

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22 By: /s/ Rachel S. Doughty

23 GREENFIRE LAW, PC

24 Rachel S. Doughty

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28 *Attorneys for Plaintiff*

1  
2 Dated: December 2, 2025

3  
4 Respectfully Submitted,

5  
6 By: /s/ Andrew A. Smith  
7 UNITED STATES DEPARTMENT OF  
8 JUSTICE  
9 Andrew A. Smith  
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16 *Attorneys for Defendants*

17  
18 Dated: December 2, 2025

19  
20 Respectfully Submitted,

21  
22 By: /s/ Frank Lawrence  
23 LAW OFFICE OF FRANK LAWRENCE  
24 Frank Lawrence, Esq.  
25 Attorneys for Specially Appearing  
26 Intervenor Yuhaaviatam of San Manuel  
27 Nation

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29 *Attorneys for Defendant-Intervenor*

30 Pursuant to Local Rule 5-4.3.4, I hereby attest that each of the other signatories  
31 concurs in the filing of this document.

32  
33 Dated: December 2, 2025

34  
35 */s/ Rachel S. Doughty*

36  
37 Rachel S. Doughty

## CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2025, I electronically filed and served the foregoing with the Clerk of the Court for the United States District Court for the Central District of California using the CM/ECF system, which will send notification of this filing to the attorneys of record.

/s/ Rachel Doughty  
Rachel Doughty